# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF NORTH CAROLINA NEW BERN DIVISION

IN RE:

CASEY FARMS, LLC.,

CASE NO: 25-01177-5-PWM CHAPTER 12

DEBTOR.

# SECOND MOTION TO EXTEND TIME TO FILE SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS

COMES NOW **CASEY FARMS, LLC.,** (the "Debtor"), by and through its undersigned counsel of record, and moves the Court pursuant to E.D.N.C. LBR 1007-1 and 9006-1 for an extension of time within which to file the schedules and statements, and in support thereof shows unto the Court as follows:

- 1. The Debtor filed its Petition on April 1, 2025.
- 2. The time to file schedules and statements expires on April 29, 2025. This motion is being filed prior to the expiration of such time.
- 3. The Debtor requires additional time to compile the documentation and information necessary to complete the schedules and Statement of Financial Affairs.
- 4. Counsel for the Debtor will be out of the country during the period of May 2, 2025 through May 13, 2025, on a trip that has been planned for some time.
- 5. Even with the extension of time, the schedules and statements will be filed well in advance of the Section 341 meeting scheduled for June 16, 2025.
  - 6. No party in interest will be prejudiced by the extension.
  - 7. Good cause exists to allow the extension until May 29, 2025.
  - 8. The Chapter 12 Trustee consents to the requested extension.
  - 9. A proposed Order is attached as **Exhibit A**.

Respectfully submitted this the 28th day of April, 2025.

NARRON WENZEL, P.A.

By: <u>/s/ David F. Mills</u>
David F. Mills
State Bar No. 18326

P.O. Box 1567 102 S. Third Street Smithfield, NC 27577 Tele: (919) 934-0049 Fax: (919) 938-1058

dmills@narronwenzel.com

# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF NORTH CAROLINA NEW BERN DIVISION

IN RE:

CASEY FARMS, LLC.,

**CHAPTER 12** 

**CASE NO: 25-01177-5-PWM** 

DEBTOR.

# **CERTIFICATE OF SERVICE**

I, David F. Mills, Attorney at Law, P.O. Box 1567, Smithfield, North Carolina 27577, certify that I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age; and that on the 28<sup>th</sup> day of April, 2025, I served a copy of the Second Motion to Extend Time to File Schedules and Statement of Financial Affairs on the following:

### VIA CM/ECF

John Bircher Chapter 12 Trustee

All parties registered to receive service in this case via CM/ECF.

I certify under penalty of perjury that the foregoing is true and correct.

This the 28<sup>th</sup> day of April, 2025.

## NARRON WENZEL, P.A.

By: /s/ David F. Mills
David F. Mills
State Bar No. 18326
P.O. Box 1567
102 S. Third Street
Smithfield, NC 27577
Tele: (919) 934-0049

Fax: (919) 938-1058 dmills@narronwenzel.com

#### **EXHIBIT A**

## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF NORTH CAROLINA NEW BERN DIVISION

IN RE:

CASEY FARMS, LLC.,

CASE NO: 25-01177-5-PWM CHAPTER 12

DEBTOR.

# ORDER ALLOWING SECOND EXTENSION OF TIME TO FILE SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS

THIS MATTER comes before the Court upon the Second Motion for Extension of Time to File Schedules and Statement of Financial Affairs filed by the Debtor; and good cause having been shown;

#### IT IS ORDERED THAT:

- 1. The Motion is ALLOWED as set forth herein.
- 2. Pursuant to LBR 9006-1, the deadline by which the Debtor shall file its Schedules and Statement of Financial Affairs is extended by 30 days, to and including May 29, 2025. Such extension is without prejudice to the Debtor's right to request a further extension.

## END OF DOCUMENT.